



28 Liberty Street, 30th Floor • New York, NY 10005  
Telephone: (212) 300-0375 • Facsimile: (212) 481-1333 • www.fslawfirm.com

May 24, 2021

**VIA CM/ECF**

**MEMORANDUM ENDORSEMENT**

Honorable Gabriel W. Gorenstein, U.S.M.J.  
United States District Court, S.D.N.Y.  
500 Pearl Street, Courtroom 6B  
New York, New York 10007-1312

**Re: Velazquez et al. v. Pizza on Stone, LLC. et al., No. 20 Civ. 9087 (PGG)(GWG)**

Dear Judge Gorenstein:

We represent the Named Plaintiffs, opt-in plaintiffs, and the putative class and collective members. For the reasons set forth below, we, along with counsel for Defendants, write to request an extension of time for Plaintiffs deadline to file their Rule 23 Motion for Class Certification, which is currently due July 9, 2021.

As of the date of this letter, the Parties have exchanged written discovery requests, responses, responsive documents, and continue to exchange documents on a rolling basis. The Parties have also worked towards the exchange of the class list necessary to send FLSA collective notice as ordered by this Court (ECF No. 40). Plaintiffs anticipate sending notice on or before June 2, 2021.<sup>1</sup>

During this time, the Parties have also agreed to attend a private mediation with Stephen Sonnenberg of JAMS on August 30, 2021, after the close of FLSA notice. In order to facilitate this mediation, the Parties respectfully request that the deadline for Plaintiffs' Rule 23 Class Certification Motion be extended to October 1, 2021. This is the first request for an extension of time of this case deadline.

We thank the Court for its time and consideration of our request.

Respectfully submitted,

/s/ Armando A. Ortiz

Armando A. Ortiz

cc: Defense counsel (via CM/ECF)

---

<sup>1</sup> Defendants have produced the contact information for virtually all putative collective members, and anticipate providing the missing contact information for any remaining individuals this week.

**MEMORANDUM ENDORSEMENT**

20-cv-9087 Document 42

Granted. The deadline for Plaintiffs' Rule 23 Class Certification Motion is extended to October 1, 2021.

So Ordered.

A handwritten signature in black ink, appearing to read "Gabriel W. Corenstein", written over a horizontal line.

GABRIEL W. CORENSTEIN  
United States Magistrate Judge  
May 24, 2021